

January 7, 2009

Mr. Brian Bennett  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Dear Mr. Bennett:

Huck PAC, Inc. (FEC ID# C00448373) is in receipt of your Request for Additional Information dated December 12, 2008, referencing our 12 Day Pre-General Report (10/1/08 - 10/15/08).

- With respect to the contributions identified in Item 1 of your letter, the Committee responds as follows:

The Committee acknowledges that our 12 Day Pre-General Report contains a reimbursement for travel that exceeds \$500 and requires itemization. The reimbursement to Lauren Huckabee for \$15,913.16 has been itemized in our amended filing (FEC-393955). The Committee regrets this error and will take steps to ensure that all future reports properly disclose reimbursements to individuals for travel and subsistence.

The Committee has reviewed all other reimbursements to individuals for travel and subsistence, and reviewed the reporting requirements outlined in the regulation at 11 CFR 104.9. Through this response the Committee is confirming that no further itemization is required under any Commission regulation for these expenditures.

- With respect to the expenditures identified in Item 2 of your letter, the Committee responds as follows:

Payments labeled as "Direct Mail" and "Postage" were all related to the Committee's activities and were not undertaken on behalf of any specifically identified federal candidates. These expenditures did not contain express advocacy and did not constitute voter drive activity and therefore do not qualify as either an in-kind contribution or an independent expenditure. Therefore, no amendments are required with respect to lines 23 or 24 of the 12 Day Pre-General Report. Any public communications that, while not constituting express advocacy, referred to a federal candidate, were reported on line 21b of the 12 Day Pre-General Report filed on October 23, 2008.

If you have any further questions or need further clarification, please do not hesitate to contact me.

Sincerely,

Bryan S. Jeffrey, Treasurer  
Huck PAC, Inc.

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